

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re:	:	
	:	Chapter 13
STEPHANIE BUTLER,	:	
	:	
Debtor.	:	Case No. 19-13308 (MDC)
	:	
	:	Hearing Date: June 20, 2023
	:	Time: 10:30 a.m.
	:	900 Market Street #2
	:	Philadelphia, PA 19107

**DEBTORS' RESPONSE TO MOTION OF NATIONSTAR MORTGAGE, LLC FOR
RELIEF FROM THE AUTOMATIC STAY**

The Debtor, Stephanie Butler, hereinafter referred to as the "Debtor," by and through her counsel, Center City Law Offices, LLC, hereby respectfully files her response to Nationstar Mortgage, LLC's ("Nationstar") Motion for Relief from the Automatic Stay. For the reasons more fully set forth below, the Debtor submits that there is no basis for Nationstar's Motion.

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Neither admitted nor denied. Debtor is without information or belief as to the current holder of the mortgage.
7. Admitted.
8. Denied. Debtor demands strict proof at a hearing on this motion.
9. Denied for the reason stated in paragraph 8.
10. Denied for the reasons stated in paragraph 8.
11. Admitted in part in that the value of the home was listed at the time of filing the petition

for relief. Denied in that the fair market value of the home may have changed considerably.

12. Denied as a legal conclusion.

13. Denied as a legal conclusion.

14. Denied as a legal conclusion.

15. Denied as a legal conclusion. By way of further response, Debtor has been actively attempting to obtain loan modification applications since December 2022. Nationstar has continually ignored Debtor's requests for a loan modification application. It was not until this morning of June 7, 2023 that Debtor with undersigned counsel was able to download a loan modification package from a representative from Nationstar. Debtor believes that she will be approved for a loan modification due to a significant change in her financial obligations.

WHEREFORE, the Debtor, Stephanie Butler respectfully prays this Honorable Court deny any and all relief requested presently by Nationstar's Motion for Relief from Stay.

Respectfully submitted,

CENTER CITY LAW OFFICES, LLC

By: **Maggie S. Soboleski**

Pa. Id. No.: 88268

2705 Bainbridge Street

Philadelphia, PA 19146

Tele.: 215-620-2132

E-Mail: msoboles@yahoo.com

Dated: June 7, 2023